



August 22, 2017

Ashley Peters
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114
Sent via email at Ashley.Peters@waterboards.ca.gov

**Re: Comments on Nutrient Management Plan Summary report from
Sacramento Valley Water Quality Coalition**

Dear Ms. Peters,

Thank you for the opportunity to comment on the draft Nutrient Management Summary Report from the Sacramento Valley Water Quality Coalition. We appreciate the significant amount of effort that went into the development of this document and the difficulties in collecting the required information for the first time. We understand that the accuracy of the data will improve in subsequent reports as additional outreach and education helps growers better understand how to provide the required information, and look forward to improved data quality in next year's report.

Having said that we have some concerns about the information and the way in which it was provided, some of which can be addressed in this year's report and others which can be incorporated in future years.

- **The report does not provide direct information about nitrogen loss.** While A/R and A/Y are useful ratios to compare nitrogen efficiency between management units of the same crop, our interest in high vulnerability areas is in understanding how much nitrogen is lost to the environment, and potentially leached to groundwater. In order to understand the impact of crops and practices on groundwater quality in a given area, we need to understand the potential for nitrogen leaching to groundwater, as expressed as A-R. We think this information should be provided in the final draft of this report.
- **Township reporting is complicated by the use of management units.** The report authors wisely chose a standard method to allocate management zones to a specific township, avoiding duplication and overlap. But because no acreage values are provided for the management units, it is impossible to understand how much acreage and how much nitrogen loading to assign for a given township. This presents difficulties



when trying to understand nitrogen loading at a geographic level. We think this can be corrected in the current year's report.

- **Comparing nitrogen efficiency on a township scale is unhelpful.** We support the idea of comparing nitrogen use efficiency ratios by crop at a larger scale than township. If the coalition is too large a scale, perhaps a subwatershed would be sufficient. We understand that the breakdown of the current year's report is an outcome of the Board's requirements, but would support a change in future years.
- **Data consistency makes comparisons difficult.** We understand that year 1 reporting can be problematic, but many of the values provided are so extreme as to make comparison of outliers irrelevant. We know that this won't be corrected in this year's report, but we look forward to seeing more readily comparable data in future years, as understanding of the program increases.
- **Best practices need to be included.** Understanding what practices are being implemented by growers, and on what scale, is key to making comparisons between growers and their nitrogen efficiency. We appreciate the analysis of soil and irrigation practice, although we think the level of detail provided in farm evaluations may be insufficient to provide a good evaluation tool. However, we strongly recommend that future reports include best practices applied by management unit.

We look forward to working with the Board and the Coalition to improve the accuracy and usefulness of this report. Thank you for providing us the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "PSS", enclosed within a blue oval.

Phoebe Seaton
Leadership Counsel for Justice and Accountability

A handwritten signature in black ink, appearing to read "Deborah Ores".

Deborah Ores
Staff Attorney
Community Water Center

A handwritten signature in black ink, appearing to read "Jennifer Clary".

Jennifer Clary
Water Policy Analyst
Clean Water Action